

FACTSHEET
(pursuant to NAC 445A.236)

Permittee Name: PRO PETROLEUM

4800 EAST EL CAMPO GRANDE
NORTH LAS VEGAS, NV 89115

Permit Number: NS2016512

Permit Type: GROUNDWATER DISCHARGE

Designation: GROUNDWATER

New/Existing: EXISTING

Location: PRO TERMINAL OPERATORS, LLC, CLARK
4800 E. EL CAMPO GRANDE AVENUE, LAS VEGAS, NV 89115
LATITUDE: 36.264599, LONGITUDE: -115.065026
TOWNSHIP: T19S, RANGE: R62E, SECTION: S29N

Outfall / Well Num	Outfall / Well Name	Location Type	Well Log Num	Latitude	Longitude	Receiving Water
001	DUST CONTROL AT 4800 E. EL CAMPO GRANDE AVENUE	External Outfall		36.264668	-115.065063	GROUNDWATER

Permit History/Description of Proposed Action

The Permittee, Pro Petroleum, has applied for the renewal of Permit NS2016512 for groundwater discharge activities at the Pro Terminal Operators (PTO), LLC's equipment storage site, located 4800 E. El Campo Grande Avenue, in Las Vegas, within Clark County, Nevada. The non-contact cooling tower blowdown water is generated at, and transported via a water truck from the PTO's fuel storage and truck loading terminal, located at 4895 North Sloan Lane, which is 1.5 miles southeast of the El Campo Grande site.

This permit was first issued May 8, 1996. The most recent permit was issued on October 1, 2021 and expired on September 30, 2026; the permit has been administratively continued since.

Facility Overview

PTO operates a fuel storage and truck loading terminal located at 4985 North Sloan Lane, Las Vegas, Clark County, Nevada. The facility stores and distributes diesel fuel, gasoline, ethanol, and fuel additives that are blended into final fuel products. As part of terminal operations, PTO uses a closed-circuit cooling tower to support its vapor recovery unit (VRU). The cooling system utilizes potable non-contact water, meaning the water does not come into contact with petroleum products or process streams during operation.

Cooling Tower System and Blowdown Water Handling

The facility operates one closed-circuit cooling tower. Water circulates through the cooling tower system to

remove heat generated by the VRU. After each cycle, water collects in a reservoir located at the base of the cooling tower. Cooling tower blowdown water is withdrawn from the reservoir at the side opposite the cooling tower fan.

The cooling tower blowdown water is "non-contact"; therefore, not exposed to petroleum products. The blowdown water is temporarily transferred to a water truck that is clearly labeled "non-potable water," with the water truck being used exclusively for dust suppression activities.

Dust Control Activity

Under this permit, PTO is allowed to use its non-contact cooling tower blowdown water for dust control at an off-site equipment storage location at 4800 East El Campo Grande Avenue, approximately 1.5 miles northwest of the main terminal.

Prior to use, the blowdown water will be analyzed quarterly for Profile 1 analytes. This monitoring ensures water quality remains suitable for the permitted dust-control use.

Dust suppression will be conducted using a non-potable water truck, applying water at rates and methods that prevent erosion, sediment runoff, avoid pooling, and any off-site migration.

The equipment storage site will continue to display signage indicating that non-potable cooling tower blowdown water is being used for dust control.

Best Management Practices (BMPs)

PTO will implement BMPs consistent with Clark County dust-control requirements and Nevada Division of Environmental Protection standards, including:

- * Maintaining non-potable labeling on water trucks
- * Ensuring controlled and uniform water application
- * Preventing overspray and off-site movement of water
- * Inspecting the site to ensure no erosion or runoff occurs
- * Performing quarterly water quality testing for Profile 1 analytes

PTO's Reclaimed Water Management Plan (RWMP) was last reviewed and approved on January 21, 2021. The Technical, Compliance, and Enforcement Branch, of the Bureau of Water Pollution Control, requires RWMPs to be updated every ten (10) years, with an updated RWMP due on January 21, 2031.

No discharges to waters of the United States are authorized under this permit.

Outfall Summary

Outfall 001 - is an external outfall for measuring and monitoring the discharged non-contact cooling water at the PTO's equipment storage site for dust control located at 4800 E. El Campo Grande Avenue.

Effluent Characterization

Nevada State Network Discharge Monitoring Report (NetDMR) data, as reported from January 2021 to July 2026, was reviewed as part of the permit renewal process. The PTO discharges non-contact cooling tower blowdown water for off-site dust control uses.

The following reported averages were taken from January 2021 to July 2026 reporting period:

Abbreviations:

N - Nitrogen

TDS – Total Dissolved Solids

TPH – Total Petroleum Hydrocarbons

mg/L – Milligrams per Liter

Gal/d – Gallons per Day

S.U. – Standard Units

Outfall 001 (Effluent):

Flow Rate: 1,139 Gal/d

Alkalinity, bicarbonate: 297 mg/L

Alkalinity, total: 354 mg/L

Aluminum: 0.06 mg/L

Arsenic: 0.03 mg/L

Barium: 0.27 mg/L

Cadmium: 0.007 – 1 instance reported¹

Calcium: 176 mg/L

Chloride: 247 mg/L

Chromium: 0.003 – 1 instance reported¹

Copper: 0.95 mg/L

Fluoride: 1.92 mg/L

Magnesium: 61 mg/L

Nitrite plus nitrate total 1 det (as N): 1.18 mg/L

Nitrogen: 5.83 mg/L

pH: 8.37 S.U.

Phosphorus: 0.69 mg/L

Potassium: 12.27 mg/L

Selenium: 0.10 mg/L

Sodium: 253 mg/L

Sulfate: 523 mg/L

TDS: 1,632 mg/L

TPH: 1.33 mg/L

Zinc: 0.70 mg/L

The following parameters were below detection during the period reviewed - Antimony, Beryllium, Iron, Lead, Manganese, Mercury, Nickel, Silver, and Thallium.

Notes:

1. Remaining quarters were reported as non-detect.

2. Nitrite plus nitrate total 1 det (as N) is a standard water quality laboratory test parameter that measures the combined amount of nitrogen present as both nitrate (NO_3^-) and nitrite (NO_2^-) in a water sample. The phrase "as N" means the test reports only the weight of the nitrogen atoms themselves, rather than the total molecular weight of the raw chemical ions. The "1 det" portion indicates that both compounds were measured together in a single determination (one chemical test run) at the lab.

Pollutants of Concern

Pollutants of concern are any pollutants or parameters that are believed to be present in the discharge and could affect or alter the physical, chemical, or biological condition of the receiving water. Common pollutants of concern for non-contact cooling tower blowdown water are TPH and Profile 1 analytes.

Receiving Water

Receiving water is the groundwater of the State. The groundwater level in the area of the discharge is approximately 97 feet below ground surface (bgs). The shallow, unconfined aquifer in the valley is non-potable due to elevated TDS levels (above 1,000 mg/L) as further described under the Las Vegas Valley Groundwater Management Program's website, www.lasvegasmgmp.com.

Compliance History

The PTO facility has been out of compliance due to reported overages of parameter concentrations, mostly singular, during the period reviewed. Continued monitoring and reporting is required with potential additional action needed if upward trending concentrations are observed.

Proposed Effluent Limitations

The proposed discharges shall be limited, monitored, and recorded as outlined in the following tables:

Re-use Discharge Limitations Table for Sample Location 001 (Dust Control At 4800 E. El Campo Grande Avenue) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Flow rate	Daily Maximum	<= 1500 Million Gallons per Day (Mgal/d)		Effluent Gross	001	Quarterly	CALCTD ^[1]
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Effluent Gross	001	Quarterly	CALCTD
Hydrocarbons, total petroleum ^[2]	Daily Maximum		<= 1.0 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Alkalinity, bicarbonate (as CaCO ₃)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT ^[1]
Alkalinity, total (as CaCO ₃)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Aluminum, dissolved (as Al)	Daily Maximum		<= 0.2 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Antimony, dissolved (as Sb)	Daily Maximum		<= 0.006 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Arsenic, dissolved (as As)	Daily Maximum		<= 0.010 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Barium, dissolved (as Ba)	Daily Maximum		<= 2.0 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Beryllium, dissolved (as Be)	Daily Maximum		<= 0.004 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Cadmium, dissolved (as Cd)	Daily Maximum		<= 0.005 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT

Re-use Discharge Limitations Table for Sample Location 001 (Dust Control At 4800 E. El Campo Grande Avenue) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Calcium, dissolved (as Ca)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Chloride (as Cl)	Daily Maximum		<= 400 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Chromium, dissolved (as Cr)	Daily Maximum		<= 0.1 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Copper, dissolved (as Cu)	Daily Maximum		<= 1.0 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Fluoride, total (as F) ^[3]	Daily Maximum		<= 4.0 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Iron, dissolved (as Fe)	Daily Maximum		<= 0.6 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Lead, dissolved (as Pb)	Daily Maximum		<= 0.015 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Magnesium, dissolved (as Mg)	Daily Maximum		<= 150 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Manganese, dissolved (as Mn)	Daily Maximum		<= 0.10 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Mercury, dissolved (as Hg)	Daily Maximum		<= 0.002 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Nitrite plus nitrate total 1 det. (as N)	Daily Maximum		<= 10 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
			<= 10				

Re-use Discharge Limitations Table for Sample Location 001 (Dust Control At 4800 E. El Campo Grande Avenue) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Nitrogen, total	Daily Maximum		Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
pH, maximum	Daily Maximum		<= 8.5 Standard Units (SU)	Effluent Gross	001	Quarterly	DISCRT
pH, minimum	Daily Minimum		>= 6.5 Standard Units (SU)	Effluent Gross	001	Quarterly	DISCRT
Potassium, dissolved (as K)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Selenium, dissolved [as Se]	Daily Maximum		<= 0.05 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Silver, dissolved (as Ag)	Daily Maximum		<= 0.1 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Sodium, dissolved (as Na)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Sulfate, total (as SO ₄)	Daily Maximum		<= 500 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Thallium, dissolved (as Tl)	Daily Maximum		<= 0.002 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		<= 2000 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Uranium, natural, total	Daily Maximum		<= 0.01 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Cyanide, weak acid, dissociable	Daily Maximum		<= 0.2 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT

Re-use Discharge Limitations Table for Sample Location 001 (Dust Control At 4800 E. El Campo Grande Avenue) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Zinc, dissolved (as Zn)	Daily Maximum		<= 5.0 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT

Notes (Re-use Discharge Limitations Table):

1. To be measured by the truckload.
2. TPH: Total Petroleum Hydrocarbons, with a full range of C6-C40, purgeable and extractable.
3. Sampling and analysis shall be conducted on the dissolved fraction.

Summary of Changes From Previous Permit

UPDATED - Parcel ownership, at which dust control activities are conducted (4800 E. El Campo Grande Avenue), to Pro Terminal Operators, LLC, based on a review of the 2019 recorded deed.

UPDATED - Business description to "Fuel Storage and Truck Loading Terminal" based online review and the Internal Revenue Services' business description.

Under Outfall 001, To be Reported Quarterly, the following change and addition were made:

CHANGED – Profile 1 analytes, with a “Daily Maximum” Base, to a “Profile 1 Dissolved” Parameter list, with a “Daily Maximum” Base, with the remaining monitoring requirements being unchanged from the previous permit. This was updated based on current Division reporting requirements.

ADDED - Footnotes 1, 2, and 3.

1. To be calculated by the truckload.
2. TPH: Total Petroleum Hydrocarbons, with a range of C6-C40.
3. Sampling and analysis shall be conducted on the dissolved fraction.

Under the SOC - Schedule of Compliance Table, the following item requirement was changed:

CHANGED - Item 1, RWMP submittal requirement.

From:

1. The Permittee shall submit two (2) copies (one electronic and one hard copy) of a new Reclaimed Water Management Plan (RWMP, also known as O&M manual) for review and approval by the Division.

To:

1. The Permittee shall submit two (2) copies (one hard copy and one electronic copy) of a Reclaimed Water Management Plan (RWMP) to the Division for review and approval. The RWMP shall follow the Division's guidance document, *WTS-1B: General Design Criteria for Preparing a Reclaimed Water Management Plan*, and be prepared by a licensed professional.

Technology Based Effluent Limitations

Technology based effluent limitations are not applicable to this permit.

Water Quality Based Effluent Limitations

Water quality based effluent limitations are not applicable to this permit.

Proposed Water Quality Based Effluent Limits (monthly/weekly/daily)

Water quality based effluent limits are not applicable to this permit.

Basis for Effluent Limitations

There are currently no specific water quality standards that have been formally adopted by the State for groundwater. However, the Division has the discretion to implement effluent limitations outside water quality standards per Nevada Administrative Code (NAC) 445A.243, which states, "In establishing an effluent limitation to carry out the policy of this State set forth in Nevada Revised Statutes (NRS) 445A.305, consideration must be given to, but is not limited by, the following: ... (2) the need for standards that specify by chemical, physical, biological or other characteristics the extent to which pollution by various substances will not be tolerated." The constituents listed in the parameters of concern have been vetted by the Division and have been included in groundwater discharge permits for many years as a means of regulating groundwater quality. Per NRS 445A.490, "No permit may be issued which authorizes any discharge or injection of fluids through a well into any waters of the State: (3) which would result in the degradation of existing or potential underground sources of drinking water."

The requirement to monitor the effluent for Profile 1 analytes quarterly has been maintained, and revised to match current Profile 1 analytes, to continue to evaluate the quality of the effluent and determine whether the effluent has any potential to impact the receiving water.

Although TDS is part of the Profile 1 analyte list, the concentration limit was set to 2,000 mg/L due to higher concentrations reported and the type of process water (cooling tower blowdown) being discharged. High levels occur due to the pure water evaporating into the air, leaving all the dissolved minerals and salts behind to concentrate in the remaining liquid.

The proposed permit retains the requirement to sample TPH, which is a mixture of chemicals found in crude oil and petroleum products like gasoline, diesel, and motor oil. Due to the facility being within a one-mile proximity of two active Bureau of Corrective Actions (BCA) remediation sites, that had a release of diesel or other contaminants, and the type of industrial activity being done at the discharge source, continued quarterly reporting is required.

Anti-backsliding

None of the proposed permit limits were changed to a less restrictive limit compared to those in the previous permit.

Antidegradation

The Division has developed an antidegradation regulation that is applied on a statewide basis, and which meets the statutory requirements of Nevada's water pollution control law found at Nevada Revised Statute (NRS) 445A.520 and NRS 445A.565 and is consistent with the federal antidegradation policy found at Title 40 in the Code of Federal Regulations (CFR) § 131.12. The objective of the Division's antidegradation regulation is to prevent degradation of Nevada's surface waters and maintain the unique attributes and special characteristics and water quality associated with high-quality waters.

As this permit is for discharges to groundwater, and not a surface water source, the new antidegradation rule is not applicable.

Special Conditions

There are no Special Approvals / Conditions applicable to this permit.

SA – Special Approvals / Conditions Table

There are no Special Approval / Condition items

Discharges From Future Outfalls/ Planned Facility Changes

There are no planned future outfalls or facility changes.

Corrective Action Sites

There are two active Bureau of Corrective Actions (BCA) remediation sites within a one-mile radius of PTO's applied use area, being two soil contamination spill sites, H-001229 for other contaminants and H-001444 for diesel. Based on the nature and extent of the soil contamination at these sites, BCA does not have any concerns with the renewal of this permit.

Wellhead Protection Program

The outfalls are not located within a Wellhead Protection Area, which represents an approximate 10-year capture zone of a well, or within a Drinking Water Protection Area, which is defined by a 3,000-foot radius around a public water system (PWS) well.

Schedule of Compliance:

SOC – Schedule of Compliance Table

Item #	Description	Due Date
1	The Permittee shall submit two (2) copies (one hard copy and one electronic copy) of a Reclaimed Water Management Plan (RWMP) to the Division for review and approval. The RWMP shall follow the Division's guidance document, <i>WTS-1B: General Design Criteria for Preparing a Reclaimed Water Management Plan</i> , and be prepared by a qualified professional.	1/21/2031

Deliverable Schedule:

DLV– Deliverable Schedule for Reports, Plans, and Other Submittals

Item #	Description	Interval	First Scheduled Due Date
1	Quarterly DMRs	Quarterly	1/28/2027

Procedures for Public Comment:

The Notice of the Division's intent to issue a permit authorizing the facility to discharge to groundwater of the State of Nevada subject to the conditions contained within the permit, is being mailed to interested persons on our mailing list and will be posted on our website at <https://ndep.nv.gov/posts>. Anyone wishing to comment on the proposed permit can do so in writing until 5:00 P.M. **11/23/2026**, a period of 30 days following the date of the public notice. The comment period can be extended at the discretion of the Administrator.

A public hearing on the proposed determination can be requested by the applicant, any affected State, any affected interstate agency, the Regional Administrator of EPA Region IX or any interested agency, person or group of persons. The request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons why a hearing is warranted. Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determined to be appropriate. All public hearings must be conducted in accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

Proposed Determination:

The Division has made the tentative determination to issue/re-issue the proposed 5-year permit.

Prepared by: **Melissa Hanson**

Date: **10/20/2026**

Title: **Staff II Engineer**

